

Analysis of Potential For Regional Involvement in Current  
and  
Pending Federal and State Human Services Legislation

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ANALYSIS OF POTENTIAL FOR REGIONAL INVOLVEMENT  
IN  
CURRENT AND PENDING FEDERAL & STATE HUMAN SERVICE LEGISLATION

The purpose of this report is to examine major pieces of existing, as well as certain pending, State and Federal human services legislation to determine what, if any, role is mandated or specified for councils of governments.

In many human services programs funded by Federal legislation the applicant is required by the Federal Office of Management and Budget to go through the areawide clearinghouse for A-95 review and notification. ABAG is the designated areawide clearinghouse in the Bay Region. Thus, a mandated role in human services exists for ABAG. (Part I, review and notification). This role is not identified specifically in the legislation except in the Housing and Community Development Act of 1974. In addition, Part IV of A-95 calls for memoranda of agreement with other areawide planning agencies. Many elected officials and professionals feel that there is a role for a COG in developing a comprehensive data base to be used by its member governments.

This report focuses mainly on actual or potential COG roles specified in human services legislation. The analysis is limited somewhat by the existing political system in California vis a vis COGs. In some states (Minnesota, for example) the COG is a direct arm of the governor. In that type of system, it is logical to assume that there is the potential for the COG to perform such activities as the state function of Title XX planning for social services. In California, COGs and the State are clearly separate and a recommendation to take over Title XX planning is unrealistic in 1976.

Because COGs are creatures of cities and counties, the analysis examines mandated and allowable roles for local government. Where relevant, state roles are included. Analysis is limited to legislation which is comprehensive and of a general nature and avoids specific categorical programs. This report focuses on legislation where the planning and program decisions were formerly Federal responsibilities and are now being shifted to state and local governments.

The following are discussed for each piece of legislation:

- Subject area
- Name of legislation, funding or authorizing agency
- Purpose of the legislation and specified activities
- State and local government roles and responsibilities
- COG roles (are COGs mentioned in the legislation; are they eligible applicants; is active involvement possible etc.)

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## S U M M A R Y   C H A R T

### FEDERAL LEGISLATION

<u>SUBJECT AREA</u>	<u>LEGISLATION/AGENCY</u>	<u>PURPOSE AND ACTIVITIES</u>	<u>STATE AND LOCAL GOVERNMENTS ROLES AND RESPONSIBILITIES</u>	<u>COG ROLE</u>
Social Services	Allied Services Act of 1975 (proposed) DHEW	To help states and local governments integrate the operation of human services.	State (governor) designates Allied Services Districts, each one of which must prepare a plan for the coordinated delivery of social services. Local government or combinations of local governments could be designated. The whole state need not be covered.	COG areas could be designated as Allied Services Districts.
Social Services	Title XX of the Social Security Act, 1975, DHEW	To plan for and operate social services for present and potential welfare recipients.	State is responsible for preparing overall State Plan. Counties must develop countywide plans with needs assessment, etc. State contracts with counties (Welfare Departments) to administer the programs. Cities have not yet been given a role in California.	COGs have no specific legislative mandate and have been given no real role in California, other than coordination of comments of the State Plan.
Health	National Health Planning and Resources Development Act of 1974	Creates a network of Health Systems Agencies and areas throughout the country for health planning and development.	Governor designates Health Services Areas according to the Act's criteria and standards (including population, geographic viability and the availability of key health resources.) Local elected officials are authorized to sit on governing body of HSAs which must consist of 60% consumers and 40% providers.	COGs have a role in A-95 Part IV--establishment of memorandum of agreement. COGs can serve as HSAs only if the designated area is congruent with the COG's jurisdictional boundaries. This is not true in the Bay Area.
Poverty	Headstart Economic Opportunity and Community Partnership Act of 1974, Community Services Administration (CSA); also called "Community Services Act"	To provide programs to alleviate the causes and symptoms of poverty. Of specific interest to this report is the Community Action Program.	Local governments can be grantees--CAA can be run by local government.	A-95 review; non-mandated coordination to avoid duplication of effort in social planning and technical assistance.





FEDERAL LEGISLATION, continued

<u>SUBJECT AREA</u>	<u>LEGISLATION/AGENCY</u>	<u>PURPOSE AND ACTIVITIES</u>	<u>STATE AND LOCAL GOVERNMENTS ROLES AND RESPONSIBILITIES</u>	<u>COG ROLE</u>
Criminal Justice	Omnibus Crime Control and Safe Streets Act of 1968, LEAA, Dept. of Justice	Institutes block grants to States for planning and operation of crime control programs.	State has ultimate authority. Regional criminal justice planning boards are often county or multicounty agencies. They develop a plan consonant with the State Plan and recommend funding of certain relevant programs. The State has final contractual authority, although there appears to be a move toward decentralization.	COGs are eligible to be designated planning areas for criminal justice. ABAG was the designee prior to 1971. However, the 9-county Bay Area now has six designees. ABAG has memoranda of agreement with Regional Boards under A-95.
Aging	Older Americans Act Amendments of 1975	To establish social service programs for older persons to help them remain self-sufficient in their own home or community rather than be placed in an institution.	State designates Area Agencies on Aging (AAAs). In the Bay Area, AAAs are county and multicounty, but not area-wide. AAAs develop a plan in consonance with the State Plan and Federal Act.	COGs can and have been designated AAAs. This is not true in the Bay Area. A-95 review is required; memoranda of agreement (Part IV of A-95) can be pursued.
Housing, Community Development	Housing and Community Development Act of 1974, HUD	Title I provides for block grants to units of general local governments for community development activities. The block grant application requires a Housing Assistance Plan showing how the local government plans to integrate housing and community development. Title II provides housing subsidies to low-income persons.	States and local governments are eligible grantees. Funds are based on formula distribution. The block grant requires that the local government coordinate previously categorical programs and applications.	A-95 review is mandated by Congress; plans must be consistent with regional policies and federal law. HUD has ruled that ABAG is not eligible to become a grantee.
Unemployment	Comprehensive Employment and Training Act of 1973 (amended by the Emergency Jobs and Unemployment Assistance Act of 1974, Dept. of Labor, Manpower Administration	To develop a comprehensive manpower program within each locality which will provide job training and employment opportunities for the poor, unemployed and underemployed.	Local government can be a prime sponsor. In the Bay Area, prime sponsors are both counties and cities and two consortia consisting of a city/county combination.	COGs are not mentioned in the legislation. A-95 is supposedly required, but DOL has provided a disclaimer. COG role is mostly technical assistance.



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PROPOSED STATE LEGISLATION

<u>SUBJECT AREA</u>	<u>LEGISLATION/AGENCY</u>	<u>PURPOSE AND ACTIVITIES</u>	<u>STATE AND LOCAL GOVERNMENTS ROLES AND RESPONSIBILITIES</u>	<u>COG ROLE</u>
Local Government Planning	AB 3352	To make available to cities and counties an alternative planning process to the General Plan. The new process requires three analyses: 1) physical/environmental; 2) human resources, and 3) fiscal/economic and specified that the local government show the interrelationships among the three areas. The addition of a human resources analysis is a notable point since a social element has not been one of the nine mandated elements to the general plan.	Cities and counties can choose to develop an overall community development strategy as an alternative to their general plan. This must be approved annually by their Council or Board of Supervisors.	COGs are required to consolidate the local government strategies and are required to review and evaluate the strategies.
Local Government Planning--Social Services Classification	AB 3507	To develop a uniform human services classification system for use by county welfare departments. Agency information previously not required, such as funding sources, geographic area, etc., would be mandated.	State Office of OPR develops a uniform system in consultation with an advisory committee consisting of representatives of the State, cities, counties, COGs, United Way and the California Welfare Rights Organization. Counties must use the system in their services inventory.	COGs can sit on advisory committee.
Local Government Planning and Data	AB 3508	To do a socio-economic data profile for each county.	State OPR would prepare standards for the profile in consultation with an advisory group consisting of representatives of the State, cities, counties, COGs, United Way and the California Welfare Rights Organization. Once standards are developed, three demonstration projects will test city-county cooperation in the design of a socio-economic data profile.	COGs can sit on the Committee which advises the State on the development of standards for the profile.
Local Government Planning and Data	Assembly Concurrent Resolution No. 169	To authorize a study of the feasibility of developing a common reporting format to allow the establishment of a social data base.	State OPR does study; local government can use data base for specified purposes.	There is no COG role mentioned in the legislation.
Social Services	AB 4034, California Social Service Planning Act	To develop an annual state social services plan to organize and coordinate all social services in the State.	State develops priorities with county input; State develops plans in conjunction with county plans. State legislature approves plan.	There is no COG role mentioned in the legislation. ABAG staff has suggested that the bill be revised to include clearinghouse review of county plans, similar to that proposed in AB 3352.





## FEDERAL LEGISLATION





## Subject Area

### Social Services

## Legislation (Proposed)

Allied Services Act of 1975; Department of Health, Education and Welfare.

## Purpose and Activities

The major purpose of the Allied Services Act is to assist states and local governments in streamlining the operation of human services. The Act contains the following five provisions, the first of which is probably the most relevant to this report:

(1) The Act would authorize demonstration grants to states and through states to localities, for the development of "allied services plans" providing for the coordinated delivery of human services. (2) Special implementation grants would be available to states and localities to assist in covering the initial costs of consolidating or allying administrative support services and management functions. (3) The Act would also permit those states which have approved allied services plans to transfer funds for similar use from one HEW program to another. (4) Administrative and technical barriers which apply to existing programs could be waived by the Secretary of HEW when they impede the allied or coordinated delivery of services. (5) The Act includes provisions for public review and comment on state and local plans and for the protection of personal information relating to clients.

## State and Local Government Roles and Responsibilities

The state (governor) designates appropriate allied services planning and service districts within each state. Unlike Title XX and HSA (see pages 8 and 11), it is not necessary that the whole state be covered by districts. It is possible for the governor to designate a special demonstration district for the purpose of preparing an allied services plan. Plans must be based upon needs assessments and services inventories; state plans must include programs under Title XX.

## COG Role

Although not yet law, the Act has prompted much speculation as to possible areawide (COG) activities. The Act states that "service areas can be the boundaries of a single unit of government or several units. In urban areas, city/county combinations are encouraged and in rural areas, existing

substate districts are encouraged." It is clear that the Department of Health, Education and Welfare feels that COGs may receive demonstration grants to prepare the allied services plans.

An interesting aside -- in Florida, areas which are proposed A-95 districts are also being used by the State Human Resources Agency. These same districts may be considered for use by the State as the services areas under the Allied Services Act.

## Subject Area

### Social Services

## Legislation

Title XX of the Social Security Act.

Department of Health, Education and Welfare -- Social and Rehabilitation Services

## Purpose and Activities

This Act requires a designated state agency to plan for and design social service programs intended to prevent or reduce dependence on welfare. Such services include day care, family planning, counseling, employment services, and health support services. Previous planning for these services had been done at the Federal level with little state discretion. The new Act delegates a great deal of this authority to the state. The Federal government requires only that services provided be directed toward the following five goals if the state is to receive Federal financial participation:

- to help people become or remain economically self-supporting;
- to help people become or remain self-sufficient;
- to protect children and adults who cannot protect themselves from abuse, neglect, and exploitation and to help families stay together;
- to prevent and reduce inappropriate institutional care as much as possible by making home and community services available; and
- to arrange for appropriate placement and services in an institution when this is in an individual's best interest.

These goals are extremely broad. In addition, the State Plan must allow for family planning and foster care services as well as three "goal oriented" services directed to the aged, the blind and the disabled. However, California State law still mandates eleven services to be provided by every county<sup>1</sup>. This, of course, limits what the state can do with the flexibility now allowed by the Federal government.

## State and Local Government Roles and Responsibility

The State Department of Health, which is part of the Health and Welfare Agency, was designated as the single state agency in California responsible for the preparation of a state-wide social services plan. Plans must contain needs assessments; services must be directed to at least one of the five goals specified above.

The State may be divided into geographic areas for planning purposes. Unlike the Allied Services Act, the whole State



must be covered. The regulations state that "the State shall consider, in defining geographic areas, the boundaries of planning areas of other human services programs." California chose counties as the basic planning units. Counties (usually the County Welfare Department) must submit to the State a "packet" describing the four elements of 1) needs assessment, 2) reporting, 3) public participation, and 4) volunteer utilization. The State contracts with counties to administer the plan. In California cities have had little input to the Title XX planning process. A new State advisory committee has been formed which includes representation from United Way. It is possible that cities and COGs may be allowed to sit on this committee.

### COG Roles

Section 228.32 of the Federal regulations requires "coordination with and input from other state, regional or local planning organizations." Little, if any, coordination has occurred with respect to COGs in this State. An informal association of California COG human services planners (called CAL-COG) has urged that the State use COG resources and has posed the following concerns:

1. What role do sub-state planning districts, and councils of governments have in the Title XX planning process? If there is none now, what role could they play in the future?
2. Do State designated agencies have professional planners with social planning backgrounds on their Title XX staff?
3. Are local Title XX plans sent to the State for inclusion in the State Plan without local elected officials approving? If so, what are the ramifications of this? Are staff setting policy?
4. Should the State review mandated programs, particularly since they were built up with open ended funding?
5. How are needs determined? Can needs assessment become a regionally coordinated activity with the results available to all service providers in a region?
6. How was OMB Circular A-95 used? Is it an effective device for Title XX review and notification?
7. What kind of membership do State advisory committees have? What should it be?
8. Is there uniformity in service definitions between states?
9. How are the plans to be monitored and evaluated?
10. What type of coordination with other social service programs exists at the State level? How can it be improved?
11. What is the role of cities in Title XX planning?

The ability of the State to develop a true State Plan for social services in the first (and possibly second) year of Title XX planning was hindered by many factors. Among these factors were the lack of funding for the increased planning activities required by the new law, the severe time constraints imposed by the Federal government, and the lack of flexibility of programs mandated by State law. The Governor's Office of Research and Planning pointed out in the introduction to the plan that the first year's Plan fell far short of the potential. However, the new proposed State legislation toward the development of a Comprehensive State Social Services Plan, (page 32 of this report) is perhaps an indication that the State intends to recognize the heavy responsibility placed on the Governor in Title XX planning and social service planning in general. It should be noted that the Assembly Committee on Human Resources, the formulator of this legislation, mentions that a coalition of which ABAG was a part had pointed out the need for better social services planning. Criticism from this coalition has helped lead to this innovative state planning legislation:

... A coalition of the League of California Cities, California's Regional Governmental Agencies, California's Community Action Programs, and United Way organizations charged that the State did not comply with Title XX in the areas of citizen involvement, monitoring and evaluation, needs assessment, priority setting, and planning and coordination.

## Subject Area

Health

## Legislation

National Health Planning and Resources Development Act of 1974; Department of Health, Education and Welfare.

## Purpose and Activities

The Act creates a network of health systems areas and agencies throughout the country for health planning and development. These agencies are to address the following six "Congressional findings":

1. Equal access to quality care, at reasonable cost, is a Federal priority but has not yet been achieved.
2. Adequate supply and distribution of health services has not resulted from the "massive infusion of Federal funds."
3. Existing laws and organizations have not achieved the following:
  - a. Uniformly effective methods of delivering health care;
  - b. Equal distribution of health care manpower or facilities;
  - c. Controls on the increasing cost of health care.
4. In-patient costs are uncontrollable and inflationary, and there are no effective incentives to develop alternatives or substitutions; e.g., ambulatory and intermediate care (emphasis on hospital costs and lack of containment).
5. The needs and concerns of the providers must be addressed via their active roles in developing health policy at all levels.
6. Public health education re prevention and methods for effective use of health services is lacking.

The purpose of the Act is to correct the above problems by: 1) facilitating the development of recommendations for a national health planning policy; 2) augmenting areawide and state planning for health services, manpower and facilities; and 3) authorizing financial assistance for the development of resources to further that policy. The Act mandated the formation of HSAs (health systems agencies) which have regulatory powers to determine the level of health care facilities and resources in their areas. They control health resource development and are responsible for health planning.



## Government Roles and Responsibilities

Based on the recommendations of Governor Brown, the Secretary of DHEW designated health service areas throughout the State. The nine county Bay Area was split into four designated health service areas -- Santa Clara; Alameda and Contra Costa; San Francisco, San Mateo and Marin; and Napa, Sonoma and Solano. There will be four health system agencies designated -- one to serve each of the health services areas. In terms of the participation of local government elected officials, the regulations state that not more than one third of an HSA governing body can be elected officials. HSA governing bodies are required to perform the following functions:

- establish health systems plans (HSP) with goals for the HSA area, and implementation plans to achieve the HSP goals
- coordinate activities with Professional Standard Review Organizations, A-95 agencies and other planning and regulatory entities
- review and approve or disapprove applications for Federal funds for health programs within the health service area
- assist the State in the review of capital expenditures proposed by health care facilities within the health service area
- assist the State in making findings on the need for new institutional health services proposed for the area
- assist the State in reviewing the appropriateness of existing institutional health services offered in the health service area
- annually recommend to State projects for modernizing, constructing and converting health facilities in the area
- gather and analyze data

## COG Role

The regulations allow COGs to be designated as health systems agencies only when their boundaries coincide with designated health services areas. Such is not the case in the Bay Area.

The regulations (Section 1) state that "the agency shall seek to enter into a written agreement with each A-95 agency whose area of responsibility is in whole or in part in the agency's health service area, for the purpose of achieving coordination of their respective activities and which shall at a minimum contain the following:

1. Provision for organizational and procedural arrangements for coordination of plan development;
2. Provision for formal arrangements for review of health and health-related matters subject to review to assure concurrent and complementary actions;
3. Provision for technical assistance to be made available by the agency to the A-95 agency and by the A-95 agency to the agency;
4. Provision to assure that actions taken by the A-95 agency which alter the area's health system will be taken in a manner which is consistent with the HSP and the AIP in effect for the area; that actions taken by the agency take into consideration the general plans of the A-95 agency; and
5. Provision for sharing of data and information needed for planning activities."

Recently an ABAG committee of elected officials approved a policy statement on ABAG's role vis-a-vis whatever HSAs are designated in the region<sup>2</sup>. The detailed roles are presented in Appendix A of this report. In summary, the roles are:

- To review regulations regarding the A-95 agency's involvement in HSA activities
- To establish a strong working relationship with the Bay Area's four HSAs in compliance with the regulations.

Activities would include:

1. Making data and research capability available to the HSAs.
2. Participating in the coordination of HSA activities.
3. Reviewing HSA plans for consistency with the comprehensive regional plan.
4. Providing assistance to the State Health System Coordinating Council.

## Subject Area

Poverty

## Legislation

Headstart Economic Opportunity and Community Partnership Act of 1974; Community Services Administration. This Act is also called the "Community Services Act".

## Purpose and Activities

This Act extends programs under the Economic Opportunity Act of 1964, the major purpose of which was to fund programs to eliminate the causes and symptoms of poverty. Many projects funded by this Act provided an opportunity for poor persons to plan and manage poverty programs. The Act is now administered by the Community Services Administration which replaces the Office of Economic Opportunity. Programs extended include Headstart, Community Action Programs (CAP), and Community Economic Development programs (CDCs). CAPs and CDCs are extended until June 30, 1977 with a possible extension to 1978 if Congress does not act. In this paper we will focus on CAP because of the comprehensive nature of the programs and because of the particular relevance to local government<sup>3</sup>(i.e. local governments can be grantees).

The legislation calls for increased involvement of state and local governments in anti-poverty efforts. Other components of the Act (migrants, health, energy conservation, senior opportunities, etc.,) are critical to human services but are categorical in nature.

## Community Action Program (CAP)

Community Action Agencies (CAAs) can be public agencies or private, nonprofit corporations. Their major purpose is to "stimulate a better focusing of available local, state, Federal and private resources upon the goal of enabling low-income families, and low-income individuals of all ages, in rural and urban areas, to attain the skills, knowledge, and motivations to secure the opportunities needed for them to become fully self-sufficient." CAAs develop their own work plans and priorities based on an analysis of local needs. They operate some programs directly and delegate others.

## State and Local Government Role and Responsibilities

While there is a State Economic Opportunity Office, as was noted, Community Action Agencies are usually either private non-profit corporations or run by local governments. Cities and counties commonly run Community Action Agencies. Of the eleven CAAs in the Bay Area, two are city run, three are county run, and six are private, non-profit.

## COG Role

The Office of Management and Budget now requires that Community Action Agencies initiate and sign memoranda of agreement with their areawide clearinghouses under Part IV of the A-95 Circular. However, regulations for implementing this directive have not yet appeared in the Federal Register. The Federal Register of February 27, of this year did state that each Community Economic Development Corporation (CDC) must develop an agreement with the areawide clearinghouse. When applying to the Federal Government for funding, a CDC must enclose this agreement. In addition, CAA applications and proposals for programs must go through A-95 review and notification.

In some states, (in two instances in Arizona) the Community Action Agencies actually run the COGs. In an area as diverse as the Bay Area and given the community action emphasis on "local initiative", this would be unlikely to happen.

Both Community Action Agencies and COGs are good technical assistance resources for cities and counties. Mutual cooperation is necessary to eliminate duplication of effort.



## Subject Area

Criminal Justice

## Legislation

Omnibus Crime Control and Safe Streets Act of 1968, amended by the Crime Control Act of 1973; Department of Justice-Law Enforcement Assistance Administration.

## Purpose and Activities

The Act created the Law Enforcement Assistance Administration (LEAA) and instituted block grants to the states for crime control programs. Unlike general revenue sharing, which uses a formula allocation, LEAA funds require a project-by-project review by most states.

The major purpose of the Act is to assist state and local governments in upgrading and improving their criminal justice operations. Money is available for planning and implementation grants to test new criminal justice methodology (such as information systems, rehabilitation techniques, etc.) Money is also available for correctional facility development, construction and renovation.

## State and Local Government Roles and Responsibilities

As in the case with so many of the programs born from the "new federalism," planning and program design have shifted from the Federal level to state and local government. The State Office of Criminal Justice Planning (OCJP) is the California State agency designated to implement the Federal Act and is the supervisory board responsible for approving the comprehensive State Plan. The California Council on Criminal Justice serves as the policy board for OCJP. Branching off from State OCJP are regional criminal justice planning boards which prepare annual regional criminal justice plans and provide recommendations to the State on local program funding. COGs are "technically" eligible for the designation of regional criminal justice planning boards; in fact until 1971, ABAG was the Bay Area designee. However, today within the Bay Region there are six such boards; the boundaries are the same as the Area Offices on Aging: the counties of Santa Clara, San Francisco, San Mateo, Alameda and Contra Costa form separate RCJPB areas; the counties of Marin, Napa, Sonoma and Solano form a combined RCJPB area.

Legally and technically, this is a State program. However although the State signs off and gives final approval of every project which is funded, the recommendations of the regional boards are rarely overturned. The State still does retain contractual authority over all programs funded.



It is possible that the State will be granting additional flexibility, discretion, and power to the regional criminal justice planning boards. Last June, a recommendation was made to Governor Brown that all LEAA funds in block grants be given to the regional agencies, leaving little or no planning to be done at the State level. Such has not yet occurred, although the State staff level has been drastically cut. Recently, however, there have been indications that Ventura County will become a demonstration site to test the decentralization of block grants and the delegation of some contractual authority from the State to the regional board. If this experiment is successful, the process may be extended to other areas.

#### COG Role

As was noted, COGs are eligible to be designated area planning agencies for criminal justice. Until five years ago, ABAG served in this capacity.

Through Federal directive, and not legislative mandate, criminal justice programs do come under A-95 review. In addition under Section IV of the A-95 directive, ABAG and each regional criminal justice planning board in the Bay Area has signed a memorandum of agreement which calls for:

- "1. Assurance that criminal justice planning reflects the needs of the region and the goals and the plans of governmental and non-governmental agencies within and relevant to the region;
2. ABAG maintaining a common data base and providing technical assistance with the agreement of the boards. Where necessary, ABAG may coordinate criminal justice planning activities.
3. ABAG will act as the areawide clearinghouse on compliance with other sections of the A-95 Circular."

## Subject Area

Aging

## Legislation

Older Americans Act and Older Americans Act Amendments of 1975; Department of Health, Education and Welfare - Administration on Aging. Title IX of this Act is administered by the Department of Labor.

## Purpose and Activities

The expressed purpose of the Act and the amendments is to establish certain social service programs for the elderly. The major goal of these programs is to enable older persons to live independent lives in their communities. A specified amount of funds must be spent on the services of transportation, home care, legal services and residential repair and renovation. To provide better transportation, state and area agencies may undertake "pooling agreements" with other authorities to jointly meet common transportation service needs. The amendments also provide for model or demonstration projects to illustrate unique or innovative approaches in developing or delivering services for the elderly.

A new amendment to Title IX, the "Older Americans Community Service Employment Program," is designed to promote part-time work opportunities for unemployed, low-income persons aged 55 and older. Grants will go to public and private agencies to cover 90% of jobs program costs. This program is administered by the Department of Labor. However, the National League of Cities magazine, Nations Cities, reports that there have been no funds allocated for Title IX in the President's budget.

## Governments Roles and Responsibilities

Under the original Older Americans Act (1965) states were given the authority to designate areawide agencies on aging (AAAs). The new amendments have not changed this. The prime function of the AAAs is to create community networks of services for elderly persons living within agency jurisdictions. Each AAA develops an area plan in consonance with the plan of the State Office on Aging and the Federal Act. There are six AAAs in the nine county Bay Area (these serve the same geographic areas as do the regional criminal justice planning boards): the combined counties of Sonoma, Napa, Marin and Solano; and the separate counties of Alameda, Contra Costa, San Mateo, San Francisco and Santa Clara. AAAs may be part of local government or private, non-profit corporations. Title IX does not go through the AAAs, but is administered directly through the Department of Labor.

### COG Role

Approximately 30% of all designated AAAs nationwide are COGs. Such is not the case in the Bay Area.

Programs under this Act are required to go through the A-95 review and notification process. Memoranda of agreement (under part IV of A-95) can be pursued between A-95 agencies and AAAs toward the goal of better coordination and information sharing.

## Subject Area

Housing, Community Development

## Legislation

Housing and Community Development Act of 1974; Department of Housing and Urban Development

## Purpose and Activities

The Housing and Community Development Act of 1974 provides a new approach to federal funding of municipal development by consolidating several existing programs for community development into a single program of block grants. In addition, the Act expands housing for low income households by revising the leased public housing program and making it a major vehicle for the provision of subsidized housing nationally. The Act contains the following 8 titles:

Title I establishes a new community development block grant program, consolidating and replacing the following seven previously enacted categorical grant programs:

1. urban renewal
2. model cities
3. water and sewer facilities
4. neighborhood facilities
5. public facilities loans
6. open space
7. housing rehabilitation loans

Title II extends and reforms HUD's basic housing assistance programs, including public housing, direct housing loans for the elderly and handicapped, and subsidies for rental or mortgage payments by moderate income families living in privately owned housing under the Section 235 and Section 236 programs.

Title III extends and amends the mortgage insurance programs of FHA.

Title IV extends and reforms comprehensive planning assistance under the Section 701 program, and also the HUD program for training and fellowships in the housing and community development field.

Title V extends and reforms the rural housing programs administered by the Farmers Home Administration of the U.S. Department of Agriculture.

Title VI authorizes national standards and Federal enforcement for mobile home construction and safety, plus a program of grants to states which agree to help enforce these Federal standards.

Title VII liberalizes the rules for mortgage lending institutions to help make mortgage money more freely available.

Title VIII contains 22 miscellaneous provisions.

For the purposes of this paper, the analysis will concentrate on Title I, The Community Development Block Grants.

As was noted, the block grant program substitutes one program for seven. In general, funds may be used to assist the types of activities which were eligible under these prior categorical programs. The program is basically a hardware one, calling for construction, renovation, code enforcement, etc., with emphasis on development of viable urban communities, principally for persons of low and moderate income. Money will be granted for social services if these services are necessary to support community improvements in the same neighborhood and it has been demonstrated that such money is not available or has been denied by another source.

#### State and Local Government Roles

Metropolitan cities and urban counties<sup>4</sup> receive entitlement funds on a formula basis. Jurisdictions which in recent years had received HUD categorical funding receive "hold-harmless" funds on a declining scale over the first three years. The funds may go to both state and local governments. State channeling of local funds is not involved in the usual sense. However, the states may accept and use community development funds on behalf of individual communities not equipped to do this for themselves.

To apply for monies under the Housing and Community Development Act of 1974, each jurisdiction must submit an annual application for funds to assist in a locally determined strategy for meeting identified community development needs and objectives. As is the case with much of the legislation examined in this paper, the increased flexibility in the use of Federal subsidies means that the funding priorities among urban development programs and needs are no longer set in Washington. Each local jurisdiction must now set its own priorities.

#### COG Role

This Act is one of the few instances in which Congress itself rather than administrative regulations has required that areawide planning agencies be given the opportunity to review and comment on applications for Federal funds. Section 104(e) of the H & CD Act states:



"No grant may be made under this title unless the application therefore has been submitted for review and comment to an areawide agency under procedures established by (OMB Circular A-95)."

Unlike most of the project applications receiving clearinghouse review, the activities or projects proposed to be undertaken with block grant funds are not, for the most part, individually of regional significance. However, viewed together, these projects are expected to have regional impact.

ABAG's role as the areawide clearinghouse consists of the following activities in connection with the Community Development Block Grant applications:

1. Notifying interested agencies and voluntary associations that the applications have been submitted and are available for review and comment;
2. Substantive review of applications, according to Federal law and regional policies, and recommendation to HUD regarding funding;
3. Technical assistance and advice to member governments in preparing applications for submission; and
4. Public information on the grant applications and clearinghouse process.

In addition to this substantive and congressionally mandated clearinghouse role with respect to block grants, Title IV of the legislation continues the comprehensive planning assistance program begun under the HUD Section 701 program. This funding has been a major source of support for the development of ABAG's comprehensive planning strategy.

HUD has ruled that ABAG is not eligible to receive Title I funding. It was thought that COGs in general might be eligible, since they are associations of local units of government, each of which is eligible for funding.

## Subject Area

Unemployment

## Legislation

Comprehensive Employment and Training Act of 1973 amended by the Emergency Jobs and Unemployment Assistance Act of 1974; Department of Labor--Manpower Administration.

## Purpose and Activities

The purpose of the Act is to provide job training and employment opportunities for the economically disadvantaged, unemployed and underemployed. It provides for a comprehensive manpower program within each locality and the balance of the state, consisting of manpower training, supportive services, and public service employment. Previous categorical programs funded under the Manpower Development Training Act and the Economic Opportunities Act are now consolidated into a single grant. Grantees must develop a comprehensive manpower plan showing manpower needs and services in their jurisdictions and methods to serve those needs.

Title I calls for comprehensive manpower services. It authorizes the provision of services to clients to enable them to obtain or retain employment. Typical services provided are outreach, intake and assessment, orientation, counseling, work experience, classroom training, public service employment, job development, job placement and transportation, and supportive services.

### Title II - Public Employment Programs

Section 201 - It is the purpose of this title to provide unemployed and underemployed persons with transitional employment. Such employment must be in jobs providing needed public services in areas qualifying for assistance. Wherever feasible, there should be related training and manpower services to enable these persons to move into employment or training not supported under this title.

Titles III, IV and V are not relevant to the purposes of this paper. They are respectively, "Special Federal Responsibilities," "Job Corps," and a "National Commission for Manpower Policy."

Title VI (the "miscellaneous title") is now perhaps the most famous. A major amendment to the original legislation has added the Title VI "Emergency Public Service Employment Program." This program was designed to have an

immediate impact at the local level on the increasing unemployment rates. By making funds available for a specific limited period of time, and by allowing local governments increased flexibility in the use of these funds, the goal was to provide a maximum number of individuals with employment opportunities. To accomplish the objectives of this employment program, eligible applicants are encouraged to develop large labor intensive employment projects which provide immediate jobs for a maximum number of participants.

### Government Role and Responsibilities

Funds may be allocated by the Federal Government to prime sponsors. Prime sponsors are:

- 1) States;
- 2) Units of general local government which have a population of 100,000 or more persons;
- 3) Consortia consisting of general local governments which are (A) located in reasonable proximity to each other; (B) each of which retains responsibility for operation of the program; (C) at least one of which has a population of 100,000 or more persons; and (D) which, as a consortium, can plan and operate a comprehensive manpower program that provides administrative and programmatic advantage over the other methods of delivering services under the Act.

There are twelve separate prime sponsors in the Bay Area: 4 cities, 6 counties and 2 consortia where eligible counties have linked with eligible cities. The 4 cities are: Berkeley, Oakland, Richmond, and Sunnyvale. The 6 counties are San Francisco, Marin, Sonoma, Solano, San Mateo and Contra Costa. The 2 consortia are Santa Clara County with the City of San Jose and Alameda County with the City of Fremont. Napa County is included in the "balance of state." Local jurisdictions within prime sponsor boundaries (i.e., smaller cities), private, non-profit agencies and special districts can become subgrantees for Title II and VI personnel as well as being able to contract for Title I funds for training and employment activities.

### COG Role

All CETA prime sponsors are required to submit copies of grant applications to the clearinghouse as part of compliance with the A-95 circular. However, since CETA's inception, the Department of Labor has placed the following language on the grant application, indicating that there is not enough time for an in-depth review, and in effect, taking the function of review away from the COG:

For applications under Title II for fiscal years 1974 and 1975, the copy sent to the clearinghouse(s) shall be accompanied by the following statement: "Due to the time constraints on implementation of Title I and II of the Comprehensive Employment and Training Act of 1973, the program plan(s) required by section 205 of the Act is (are) being submitted to the clearinghouse(s) and the Department of Labor simultaneously. Clearinghouses are requested to forward any comments directly to the Assistant Regional Director for Manpower. This review and comment procedure has been approved by the Office of Management and Budget."

ABAG has never reviewed CETA applications as part of our A-95 role. COGs are not mentioned in the legislation. Their roles under CETA have been wrought from existing community linkages and center on technical assistance and information sharing.

## STATE LEGISLATION





## State Legislation

Until recent months, most State human services legislation focused on discrete social issues, such as alcoholism, child care, and transportation for the elderly. Beginning this year, however, legislation has been proposed which addresses comprehensive human services planning. The catalyst for much of this proposed legislation was the work of State Assemblyman Eugene Gualco and his Joint Subcommittee on Community Development and Assemblyman Kenneth Maddy and his Assembly Committee on Human Resources.

As the first section of this paper has shown, much of the recent new Federal human services legislation mandates that states play an increasing role in planning. Much of this responsibility was thrust on states with no concomitant financial aid from the Federal Government for the development of a state human services planning capability. Nonetheless, the State of California is beginning to address its responsibility in the planning for human services. The legislation described in this section illustrates this new orientation.

All of the legislation discussed is proposed. Most of it appears in "skeleton" form and is open to revision.

Since most of these bills have evolved simultaneously, some of them will be discussed together.

## Subject Area

Local Government Planning

## Legislation

Assembly Bill 3352 (Gualco & Calvo, March 8, 1976); no appropriation was voted.

## Status

Referred to Committee on Local Government; Hearings are to be held in May 1976.

## Purpose and Activities

The purpose of the bill is to "make available to local government a planning process" which provides an alternative to the general plan and its nine mandated elements.

The bill permits but does not require local government to develop a "community development strategy" consisting of three analyses: 1) physical-environmental, 2) human resources and 3) fiscal-economic. If approved each year by the local city council or board of supervisors, the strategy would guide local actions including zoning, grant applications, etc. The overall intent of the legislation is to provide better integration of physical and social planning.

The decision to include a human resources analysis is notable since human resources is not one of the nine mandated elements of the general plan. The human resources analysis section requires the following elements:

- 1) Identification of the "elements" which make the local government a community;
- 2) A profile showing the characteristics and needs of the citizens;
- 3) A community profile and services inventory. Cities must show how they are planning to coordinate and evaluate services; counties must justify any differences between the city and county analysis.
- 4) Identification of housing needs;
- 5) Identification of health needs;
- 6) Consideration of the civil rights impact of the community development strategy; and
- 7) Identification of the relationship and impact between the human resources analysis and the other two required analyses.

Elements two, three, four and five require data expertise. To develop this expertise, state legislators have proposed the resolution and bills which are discussed on page 30.

### Government Roles and Responsibilities

The community development strategy is to be developed by the city or the county and approved annually by the council or board of supervisors. Local governments must identify problems which go beyond their boundaries and must specify the measures to address these problems as well as the measures needed to coordinate and cooperate with other communities sharing the same problems. (One possible designated coordinative mechanism may be a COG.)

The input of cities into their respective county's community development strategy has not been ignored. The legislation specifies that counties must coordinate their analyses with that of cities within their jurisdictions. However, actual mechanisms for this coordination are not specified.

The city or county is required to maintain its general plan and its mandated elements until the State Office of Planning and Research has approved the alternative planning process. OPR is to provide assistance in the implementation of programs and activities and may authorize State agencies to grant preferences to the local government in the administration of State programs if the following conditions are met: 1) The community development strategy is successfully reviewed by the areawide agency; 2) the CD strategy complies with the requirements of this article; and 3) the local agency is achieving "reasonable progress" in implementing its CD strategy. Also, OPR may direct the California Housing Finance Agency to allocate a portion, not to exceed 25%, of its annual housing funds for new construction and rehabilitation of housing to be made available for housing projects within the local agencies having CD strategies approved by OPR.

### COG Role

COGs have a definite and important role in this legislation

"In the review process, the Office of Planning and Research shall consider only those community development strategies which have been reviewed and approved by the areawide councils of governments."

"The councils of governments shall (1) review each application for compliance with the provisions of this article<sup>6</sup>; (2) evaluate the adequacy of the performance standards established within each community development strategy, (3) evaluate the extent of active, informed involvement of the citizenry, (4) evaluate the policies,



goals, objectives, programs, and activities of each community development strategy for consistency with the areawide community development strategy and with other areawide plans, and (5) ascertain the progress of the applicable local agency towards achieving the policies, goals, and objectives in the community development strategy.

If a COG disapproves of a city or county community development strategy, the city or county may request the Office of Planning and Research to review the disapproval. OPR is to publish and adopt guidelines to administer the review.

Also, each council of governments is directed to develop and maintain an areawide community development strategy which consolidates city and county strategies within its jurisdiction according to guidelines to be developed by OPR. Areawide plans shall include joint plans adopted by two or more local governments and plans affecting two or more local governments within the area.

## Subject Area

Human Services Planning and Data Requirements

## Legislation

Assembly Bills 3507 and 3508, Concurrent Resolution 169  
(Gualco)

## Status

All have been referred to the Assembly Committee on Human Resources. Hearings are to be held in May 1976.

## Purpose and Activities

As previously noted, these three pieces of proposed legislation are all an outgrowth of the data requirements of AB 3352 and will therefore be discussed together. They also relate directly to AB 4034 which is discussed on page 32.

AB 3507 requires that the State Office of Planning and Research develop a uniform human services classification system to be used by county welfare departments in maintaining a social services inventory. The system is to be developed in consultation with an advisory committee consisting of representative State agencies, cities, counties, COGs, United Way Agencies and the California Welfare Rights Organization. Also, additional agency information not previously kept on existing inventories will now be required<sup>7</sup>.

AB 3508 requires that OPR would prepare a socio-economic data profile (by census tract) of each county. This profile would be updated every five years. Standards for the profile would be developed in consultation with an advisory committee composed in the same manner as in AB 3507. A new section added to the original legislation proposes three demonstration projects which would test city/county cooperation in the development of the profile after the standards have been established by the statewide advisory committee.

Assembly Concurrent Resolution No. 169 requires that OPR study the feasibility of designing a common reporting format for the purposes of establishing a pool of social information (data base). This data base would be used by local governments for specified purposes, such as developing the planning strategy described in AB 3352.

## Local Government Roles and Responsibility

Local government had been given little authority in the legislation as it was originally written; the majority of the responsibility was assumed by the State. New amendments to AB 3507 and AB 3508, while still centralizing authority in the State, provide much more opportunity for local government input<sup>8</sup>. In both instances, an advisory committee will be formed to help design the data systems. This committee will consist of representatives of cities, counties, COGs, the State, United Way and the California Welfare Rights Organization. Also, in AB 3508, once the standards have been established by the advisory committee, there will be three demonstration projects which will require city-county cooperation in the design of that county's socio-economic data profile.

There is no question that centralized and comparable data requirements make sense. It should be noted, however, that many local governments have already created their own data systems. For instance, in Alameda County, the cities, the county, ABAG, the League of California Cities, and two community action agencies spent a year developing a classification system satisfactory to all groups. It is unclear how this system will relate to the State system. The State is now evaluating all locally developed classification systems and ABAG has drawn their attention to the Alameda County model.

### COG Role

In the amended versions of AB 3507 and 3508, COGs can sit on the committee which advises the State on the development of the human services classification system and the standards for the socio-economic data profile.

## Subject Area

Social Services Planning

## Legislation

Assembly Bill 4034, California Social Service Planning Act.  
(Introduced by the Assembly Committee on Human Resources)

## Status

The Assembly Committee on Human Resources held hearings on April 27, 1976. The vote was in favor of the bill which was then sent to the Ways and Means Committee.

## Purpose and Activities

This bill requires the Governor to prepare an annual State social services plan that will organize and coordinate the operation of all social services in the State, regardless of their funding sources<sup>9</sup>. All social service appropriations, including those of Title XX, will be considered together, thus allowing transfer of resources to identified priority areas. In addition to identifying priority areas, the plan would include an evaluation of the prior year's program, an assessment of needs and resources, a description of the ways in which resources will be used to meet identified needs, and a description of the proposed training program under Title XX.

The overall purposes of the Act are stated by the Assembly Committee on Human Resources:

"In times of fiscal constraints, it is of utmost importance that available funds are used to meet critical needs. This requires a systematic social services planning process which coordinates all resources and benefits, both public and private, at the city, county and state levels and prioritizes the delivery of services in an equitable and realistic way."

## State and Local Government Role and Responsibility

There are several steps in the planning process. Briefly, --

First, each county shall submit a data analysis showing its social needs and possible solutions.

Second, the State will set priorities and allocations based on step one. There is some room here for local initiative. If no substandard conditions exist, the local governments may propose locally appropriate priorities.



Third, counties develop and submit proposed plans to the State consistent with the priorities and allocations established in step two.

Fourth, the State Department of Health prepares a plan based largely on the proposed county plans submitted in step three.

Fifth, this plan is reviewed by the Governor, OPR, the Department of Finance, and presented to the State Legislature. When passed, it becomes the California Social Service Act for the forthcoming year.

No mention is made of city involvement. During public hearings held in April, ABAG and others called the Committee's attention to the lack of city involvement. It appears that some revisions will be made.

#### COG Role

COGs are not mentioned in the legislation. ABAG staff has testified to the Committee on Human Resources and has suggested clearinghouse review of county plans similar to the review proposed under AB 3352. (See Appendix B).

## CONCLUSION



## Conclusion

Except for the Housing and Community Development Act of 1974, none of the Federal legislation examined in this paper mandates specific roles for a Council of Governments. The Federal Allied Services Act, if passed, may pave the way for a COG demonstration to plan for coordinating and integrating the operation as well as the planning of human services on a regional basis. The National Association of Regional Councils feels that in terms of human services "regional councils will continue to be in the forefront for some very difficult domestic issues, such as the degree of public involvement in health planning, aging and any type of allied services block grant programs." However, all of these roles are not yet required by Federal legislation.

There may be many reasons for this lack of specified COG involvement. First, COGs are young in the field of human services. Second, in most states (certainly, in California) COGs do not deliver or operate human services programs, but concentrate activities in human services planning. This planning has often been directed to a specific functional categorical area such as criminal justice, health, and aging, rather than being comprehensive in approach. However, councils of government, especially those in California, have become increasingly involved in overall human services activities. The article in Appendix C illustrates this fact. This increasing experience and competence may suggest to Federal legislators that COGs be taken into account in new human services legislation.

Some State legislators have already recognized a role for COGs in human services planning. A mark of the future may be the important COG activities specified in proposed State legislation, which, if passed would lead to the integration of physical and social planning. In AB 3352 sponsored by Assemblymen Gualco and Calvo, councils of government are required to prepare and maintain a community development strategy for consistency with both State and areawide policies. Also, the bills flowing from AB 3352 (AB 3507 and 3508) would allow for COG participation in the design and development of data systems.

Even without present clear legislative mandate, there may be important roles for COGs in facilitating the intent of the legislation. Technical assistance, capacity building, development of a common data base for assessing needs, assisting in the creation of services inventories, etc., are all ABAG roles which will be explored more fully in other reports which will be presented to the ABAG Human Services Capacity Building Task Force for recommendations to the ABAG Executive Board.





## FOOTNOTES



1

There will be 12 mandated services in the next fiscal year. A legal interpretation has questioned whether this restriction is as severe as the State has interpreted it to be. On May 6, 1975, in response to a request from the Title XX Task Force which consisted of State and County staff persons, The Office of Legal Affairs of the State Department of Health responded:

"It is possible to achieve the intent of the Legislature as expressed in Section 12250 without providing all the services mentioned in Section 12251. Therefore, without clear legislative language specifying that each such service is to be utilized in achieving the intent of Section 12250, our opinion is that every service mentioned in Section 12251 need not be provided in every county of the State."

Regardless, there now appears to be movement in the State toward elimination of some of the mandated services and the setting of new priorities developed from needs assessments, service inventories, etc. See page 32 of this report for a discussion of Assembly Bill 4034--proposed legislation for a State Social Services Plan.

2

Work Program Coordinating Committee, February 12, 1976.

3

Community Economic Development (CDC) grantees are private, non-profit agencies rather than arms of local government.

4

Cities with 50,000 or more population in metropolitan areas and counties which, with cooperating cities, account for 200,000 or more population.

5

It should be noted that the legislation requires cities to do service inventories. This is perhaps unnecessary overlap since counties are already required to do so under State interpretation of Title XX. In fact, under other related legislation now being proposed (AB 3507-, see page 30 of this report) the county is required to add new information to their existing services inventory and the State is to develop a classification system for the inventory.

6

An important fact is that ABAG has never reviewed every general plan. In this legislation, ABAG would be required to review every community development strategy within its jurisdiction.

7

Under State law, county welfare departments are now required to do service inventories, primarily for the purpose of referring welfare clients to existing services. These inventories vary a great deal from county to county in terms of information stored, quality of the information, frequency of update and of course, the classification system used.

8

These amendments resulted in part from staff suggestions by ABAG and the League of California Cities.

9

The Committee notes that the very first step of the overall planning process will be an examination of all human services resources in terms of funding constraints in an attempt to identify and effectively utilize whatever flexibility exists.

## APPENDIX





## THE ASSOCIATION OF BAY AREA GOVERNMENTS HSA ROLES

- A. Review regulations regarding the A-95 agency's involvement in HSA activities.

Since ABAG will be the only nine county agency involved in health projects (after BACHPC closes its doors later this year) it will be in a good position to provide input on how the HSA regulations are affecting not only A-95 agencies but HSAs as well. By being active in HSA plan development and implementation, ABAG will be able to make recommendations based on experience with A-95 and HSA problems as they relate to these regulations.

- B. In compliance with Sections 122.107(c)(10)(11)(12) of the regulations regarding coordination of multi-jurisdictional planning, establish a strong working relationship with the Bay Area's four HSAs.

1. Making data and research capability available to the HSAs.

- ABAG has capability of providing several types of data necessary for planning and making planning decisions. Most of this data is demographic in nature; it describes population characteristics of a given geographical area in terms of number of people, age and sex breakdowns, income levels, etc.
- Another source of potentially useful data is the series of projection models developed by the ABAG/MTC joint program. Output from these models includes numerical projections of future activity levels (e.g., number of people, number of housing units, industrial activity, etc.) by small geographic units. Data of this type could be very useful in planning for future service needs.
- ABAG is also developing an automated system for handling geographically-referenced data. This system will include the ability to analyze physical, environmental, and socio-economic data in a spatial framework. Potential uses of a geographic data base include determination of accessibility, delineation of service areas, and natural hazards evaluation.
- ABAG has developed the capability to perform the data collection and analysis required of HSAs, and is in the process of collecting data and performing the tasks outlined in Section 122.107(c)(1)(ii) through (v). ABAG is the only agency involved in doing small area demographic work essential to analysis of health data.

2. Participating in the coordination of HSA activities.

- HSA regulations require HSAs to establish relations with neighboring HSAs and to enter into written agreements with PSROs and HSAs having only a portion of the SMSA in their area. Given that ABAG will be the only nine county agency involved in health on a regional level, one with working relations in all the Bay Area health service areas, ABAG is in a unique position to assist in HSA implementation and participate in the coordination of inter-HSA activities.

- Possible ABAG coordinating tasks could involve data exchange, development of a common data base, resource sharing, and inter-HSA patient transportation.

3. Reviewing HSA plans for consistency with the comprehensive regional plan.

- ABAG needs to review HSA plans so as to assure planning coordination in the nine county region. Not only because it is the A-95 agency, but also because it is a regional planning body with plans that involve all four health service areas in the Bay Area and must carry out a review of plans having multi-jurisdictional input.

4. Giving assistance to the State Health System Coordinating Council (SHSCC).

- As a regional agency, ABAG is in a position to assist the SHSCC by being its HSA liaison in the Bay Area and providing it with technical assistance.

ASSEMBLY COMMITTEE ON HUMAN RESOURCES

April 12, 1976  
San Francisco

Testimony by Mrs. Bessanderson McNeil, Chief, Human Services Division, Association of Bay Area Governments

Mr. Chairman and distinguished members of the Committee -- thank you very much for the opportunity to appear today and present some suggestions on AB 4034 from the perspective of the cities and counties who make up the Association of Bay Area Governments.

ABAG has a long-standing position -- with which some of you are familiar -- supporting integrated planning at the State and regional levels. Most of our own legislative efforts have been devoted to the creation of a multi-functional planning agency for the Bay Area, because the nine-county Bay region is one of the most governmentally complex of the country's metropolitan areas. We have, however, supported efforts to bring to an end the present thoroughly confusing system of State planning.

The committee's bill is a welcome step -- long overdue -- in the development of comprehensive planning in social services. It isn't a final step, and ABAG believes that many of these responsibilities assigned to various agencies should ultimately be assigned to comprehensive planning agencies -- at the State and regional level. We readily recognize, however, that the Legislature has been unable to agree on comprehensive planning legislation -- either for the State or its various metropolitan regions -- and our comments today are offered in that context.

The bill offers a sane and structured approach to the severe financial constraints placed nationwide on the delivery of human services. Many resources are simply not being exploited to their fullest potential. Since it is unlikely that more social service money will be available, it is necessary to develop a mechanism to use existing resources as wisely as possible. This involves a rational planning process -- investigating what is presently available in a systematic way, examining the potential flexibility of these resources and re-arranging them to assure that California citizens needing social services have these needs met.

The social services plan would no longer be a staff plan, but instead a plan of the elected officials -- a Governor's plan presented for approval by the Legislature. Citizens who feel they have been denied their rightful services can appeal to those they elected to office.

The present system the bill hopes to change has been described over and over. It has almost become a cliché -- however true -- to say there is much fragmentation, much duplication, gaps and overlaps. It is a non-system: a conglomeration of services funded by many different sources, with different requirements, some with the same target groups and many addressed to the same goals. Many agencies, such as those having information and referral functions, serve the same groups. These activities are expensive and non-comprehensive.

We will ask our legislation committee to consider support to improve the bill's chances of improving the present system. We recognize that the bill -- which is ambitious and may fail -- is drawn directly in response to



the requirements of Title XX and is, therefore, a State program. However, we would encourage the participation of other levels of government and of citizens. We propose the following revisions or additions:

1. Cities must be given a role -- a strong role in the planning process.

Most of the recipients of social services are city residents. This is especially true in a region as urbanized as the Bay Area. Surely cities, being the level of government closest to citizens and their needs, should have a role in influencing the types of social services provided to these citizens. The League of California Cities' "Action Plan for the Social Responsibilities of Cities" has done exactly what the title implies -- it has encouraged cities to take action to solve city residents' human services problems. Cities throughout the State have become involved in social planning. Cities have initiated needs assessments, services inventories, and have added social elements to their general plans. Preliminary results of a statewide survey undertaken by the League and ABAG show that many Bay Area cities are engaged in these activities. City advice is too valuable to be ignored. One example of how city involvement could be structured is to require city approval of these plans, as was the case for countywide solid waste management plans. This process has worked fairly well in the Bay Area, and could provide a useful model for social services.

2. Technical and financial assistance in planning and data analysis should be given.

County welfare departments are generally the most qualified by experience

and training to deliver services to those who need them. Much time is spent operating programs, but with some exceptions, many of these county agencies have not had much experience in integrated planning for the programs. While county input in the form of analysis of needs is expected to lead to the State's decisions on priorities and allocations, there is no mechanism specified or funding appropriated to assist the counties in doing this. While some urban counties have developed sophistication in data analysis, others have not. There should be a mechanism for "technology transfer" from those counties with experience to those without it.

3. Areawide review of county social service plans should be mandated in the legislation, as in the solid waste field. This review would be required by AB 3352 (Gualco and Calvo), which would allow for a comprehensive planning strategy on the part of local governments. Areawide review would assure coordination of county plans since plans of contiguous counties will have effects on each other. It would ensure that cities have had a chance to provide adequate participation in the planning process, that appropriate citizen involvement takes place, and that State policies and priorities are followed. Areawide review would remove a tremendous burden from the State. And, of course, the State should be willing to provide financial resources to pay for it.
4. Statewide priorities should be set only if they can be established within an open and flexible framework.

Priorities must reflect the fact that California is not a homogeneous state.

The bill does attempt -- through prescriptive standards -- to allow local governments to propose locally appropriate priorities. The flexibility must be strengthened and spelled out more carefully. The legislation already seeks flexibility for current legally mandated social services. This effort should be pursued. It is neither efficient nor effective to require that a dense urban county such as Alameda and a small rural county such as Inyo provide the same services.

Three other bills address many of the data requirements of this bill and of AB 3352, and ought to be considered carefully.

AB 3508 (Gualco) calls for the Office of Planning and Research to develop a socioeconomic data profile for each county in the State. AB 3507 (Gualco) calls for OPR to develop a common human services classification system to be used by each county welfare department, the main administrator of social services. ACR 169 (Gualco) calls for the development of a common reporting format leading to a social data base to be used by local government for specified purposes such as planning.

These bills should be made compatible. To be effective, the statewide social services plan proposed by AB 4034 must be based on rational decisions of resource allocation. A statewide system of common standards must be developed. A State plan cannot exist if all counties talk different languages, and it is true that social services planning is in a multi-lingual state. The State should not develop these data systems without direct participation by local government -- the prime users of the systems. While we would applaud the efforts to make sense

Page Six

out of the melange of data that now forms a barrier to comprehensive planning, we must insist that local governments be very substantially involved in the efforts to establish uniform data systems. ABAG would welcome the opportunity to suggest (by working with your staff) specific ways of involvement.



# NEWSLETTER

## League of California Cities

California Cities Work Together

Sacramento, Ca. 95814  
February 1976  
Number 7

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ASSOCIATION OF  
BAY AREA GOVERNMENTS

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## 5. California COGs Explore Social Planning Roles

Like cities, regional planning agencies in California have begun to consider human resources functions in recent years. Initial Council of Government (COG) efforts have been in individual categorical ventures such as health, manpower, or criminal justice planning efforts. Some have broadened their capabilities to consider the overall human resources spectrum. The long range potential of COGs in social planning is recognized in the League's Action Plan for the Social Responsibilities of Cities, particularly in terms of coordinating and integrating the planning efforts of local governments. As cities develop and improve their social planning capabilities, they can benefit from the perspectives of areawide planning bodies.

In summary, each of the COGs described below is exploring new roles in the human resources area. They each have staff working exclusively in the area and most have established committees of local government officials to provide policy direction for their activities. These COGs are working to integrate social and physical planning, and they are using the A-95 review process as a mechanism for promoting intergovernmental coordination.

### Association of Bay Area Governments - San Francisco Bay Area

ABAG formalized its commitment to social planning through the creation of its Human Services Division, which currently includes planning in the areas of manpower, criminal justice, disaster, health, health facilities, and emergency medical services. The division now has a staff of 12 and oversees the HEW Human Services Capacity Building Project that is working in partnership with the League and CSAC. A newly appointed capacity building task force will provide policy direction for the project and will be active in formulating future ABAG human service roles and proposed regional human service policy and plan development. In addition ABAG has convened the "CAL-COG Human Service Planner Group" through which social planning staff of the major COGs come together to discuss topics of mutual interest. For additional information contact:

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### Sacramento Regional Area Planning Council

SRAPC's major effort through its Social-Economic Division has been the completion of a Human Resources Element for its Regional General Plan. The major purpose of the Plan is to provide goals and policies for local governments and thereby foster local level planning and facilitate integration of social and physical planning on a regional basis. It also serves as a basis for A-95 review of socially oriented federal grant applications.

SRAPC staff now are seeking data that will help local decision makers implement the goals of the Plan. A report is being prepared on social services funding in the region, and evaluation of transit service for minority communities and of housing supply for the handicapped are underway.

In order to make comparable statistics available, given the confusing overlay of service and planning boundaries currently used by different agencies, a cooperative effort is underway with agencies to define "planning analysis districts" from which social indicator statistics and client data can be drawn. Future directions include a regional needs assessment to be done in conjunction with cities and counties and the provision of technical assistance to local governments. For more information contact:

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Southern California Association of Governments - Los Angeles Area

SCAG has been particularly interested in developing policies and goals in the human services area that will be usable for local governments. These can serve as guidelines for local governments applying for Federal funds for human service activities and thereby improve coordination through the A-95 review process. This coordinative role is also carried out by encouraging linkages between local governments and private sector human service providers.

Other activities include developing social impact analyses of plan elements adopted by SCAG and monitoring relevant State and Federal legislation. Technical assistance to cities preparing social elements and the distribution of a newsletter for information exchange on human services matters are also included in the Human Services work program. In addition, a regional survey of human service activities by local governments is being prepared. For further information contact:

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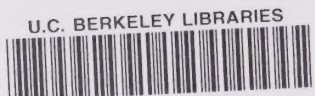
Comprehensive Planning Organization - San Diego

Currently CPO is investigating three major areas of concern related to human resources: 1) funding patterns for social services, 2) relations between physical and social planning, and 3) the identification and resolution of cooperation and coordination problems. Efforts in this third area include the use of the A-95 review process and memorandums of agreement to promote coordination and standardization among agencies and local governments involved with human resources. A future objective is the development of a social element to the Regional General Plan to be done as a cooperative effort with local governments and single purpose planning agencies in the region.

CPO staff are also working closely with the staff of the Regional Criminal Justice Programs. They are working in relation to the designation of the new Health Systems Agency. For more information contact:

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